

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 23-CR-20175-KMW

UNITED STATES OF AMERICA, §

Plaintiff, §

vs. §

DANIEL ALBERTO CARPMAN, §

Defendant. §

**MOTION FOR DISCLOSURE OF  
EXPERT WITNESS SUMMARIES, DOCUMENTS, OBJECTS,  
REPORTS OF EXAMINATIONS, AND TESTS**

**COMES NOW**, the Defendant DANIEL CARPMAN, by and through his undersigned counsel, and moves this Court to enter an order requiring the Government to provide the following supplemental discovery prescribed by federal law:

1. The defendant requests disclosure under Fed. R. Crim. P. 16(a)(1)(G) of expert testimony that the Government intends to introduce in trial during its case-in-chief. This includes experts under Federal Rule of Evidence 702 and 704, including law-enforcement officers who will testify as experts. In accordance with Rule 16(a)(1)(G)(iii) the disclosure for each expert witness must contain the name of the expert witness, the witness' qualifications, including all publications authored in the previous 10 years, a complete statement of all of the witness' opinions, and the bases and reasons for the opinions, and a list of all other cases in which, during the previous 4 years, the witness has testified as an expert at trial or by deposition. Finally, Rule 16(a)(1)(G)(v) requires that each disclosure must be approved and signed by the witness. The purpose of the amended Rule, which became effective in December of 2022, is to facilitate trial preparation, allowing the parties a

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fair opportunity to prepare to cross examine expert witnesses and to provide ample information so that the defense can secure opposing expert testimony, if needed. For these reasons, this is an ongoing discovery obligation and upon a more complete review of the discovery and the discovery yet to be provided, undersigned counsel will comply with the reciprocal nature of the rule.

2. Additionally and by this filing pursuant to Rule 16(a)(1)(E) the Defendant requests all documents and objects obtained from or belonging to the defendant; that the government intends to use in its case-in-chief at trial and that is material to preparing the defense, including but not limited to all items seized pursuant to a search of the defendant's home and office on the day of his arrest.

3. Finally, the Defendant requests the results or reports of any scientific test or experiment as required by Rule 16(a)(1)(F).

WHEREFORE the Defendant respectfully requests that the Court enter an Order requiring the Government to disclose the items herein and to set a time for the Government's disclosure.

**[CERTIFICATE OF SERVICE ON FOLLOWING PAGE]**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was tendered via CM/ECF portal to all interested parties on this 21<sup>st</sup> day of July 2023.

Respectfully submitted,

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